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9 Attorneys for United States of America

10  
11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA  
13 SAN FRANCISCO DIVISION

14  
15 UNITED STATES OF AMERICA, ) No. CR 12-00511 RS  
16 )  
17 v. ) STIPULATION AND [PROPOSED] ORDER  
18 JERMAINE JONES, ) CONTINUING MATTER AND EXCLUDING  
19 ) TIME UNDER 18 U.S.C. § 3161  
20 Defendant. )  
\_\_\_\_\_ )

21  
22 On November 27, 2012, the parties made a third status appearance before the Court  
23 during which time a motions briefing schedule was set with defendant's motions being due on  
24 January 29, 2012. Further, the parties requested, and the Court ordered, a continuance until  
25 January 29, 2012, because the United States produced several items of discovery to defendant  
26 which will require defendant's review and further investigation. Thus, the purpose of the  
27 continuance request was to afford defense counsel adequate time to review the additional  
28

1 discovery.

2 The parties also requested, and the Court ordered, that the time between November 27,  
3 2012 and January 29, 2012, would be excluded from the running of the speedy trial clock for  
4 effective preparation of counsel, 18 U.S.C. § 3161(h)(7)(B)(iv). The parties agree that, taking  
5 into account the public interest in prompt disposition of criminal cases, good cause exists for this  
6 extension. The parties also agreed that the ends of justice served by granting such a continuance  
7 outweighed the best interests of the public and the defendant in a speedy trial. 18 U.S.C. §  
8 3161(h)(7)(A).

9 SO STIPULATED:

10 MELINDA HAAG  
11 United States Attorney

12

13 DATED: November 28, 2012

/S/  
14 NATALIE LEE  
Assistant United States Attorney

15

16 DATED: November 28, 2012

/S/  
17 BRANDON LEBLANC  
Attorney for Jermaine Jones

18 For the reasons stated above, this matter is continued until January 29, 2012, when  
19 defendant's motions are due. The Court finds that the exclusion of time from November 27,  
20 2012 through January 29, 2012 is warranted and that the ends of justice served by the  
21 continuance outweigh the best interests of the public and the defendant in a speedy trial. 18  
22 U.S.C. § 3161 (h)(7)(A). The failure to grant the requested continuance would deny the  
23 defendant effective preparation of counsel and would result in a miscarriage of justice. 18 U.S.C.  
24 § 3161(h)(7)(B)(iv).

25 SO ORDERED.

26 DATED: 11/28/12

  
27 HONORABLE RICHARD SEEBOORG  
United States District Judge